

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA,

v.

**NOTICE OF MOTION**

Case No.: 19-CR-227

JOSEPH BONGIOVANNI,

PETER GERACE, JR.,

Defendants.

---

UNITED STATES OF AMERICA,

v.

PETER GERACE, JR.,

Case No.: 23-CR-37

---

**PLEASE TAKE NOTICE** that upon the annexed attorney declarations and financial information submitted to the Court *ex parte*, Peter Gerace, Jr., by and through counsel (Mark A. Foti, Esq. and Eric M. Soehnlein, Esq.) moves for an Order of this Court assigning counsel to represent him pursuant to the Criminal Justice Act and for other and further relief as the Court deems just and proper.

DATED: December 3, 2024

s/ Mark A. Foti, Esq.

Mark A. Foti, Esq.

**The Foti Law Firm, P.C.**

16 W Main Street, Suite 100

Rochester, NY 14614

(585) 461-1999

(585) 491-6512

s/ Eric M. Soehnlein, Esq.

Eric M. Soehnlein, Esq.

**Soehnlein Law, PLLC**

2100 Main Place Tower

350 Main Street

Buffalo, NY 14202

(716) 771-9092